

do Campo & Thornton, P.A.

ATTORNEYS AT LAW

CHASE BANK BUILDING
150 S.E. SECOND AVENUE • SUITE 602
MIAMI, FLORIDA 33131
PH 305 358 6600 • FAX 358 6601
DANDTLAW.COM

May 8, 2022

VIA CM/ECF

The Honorable George B. Daniels
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

*Re: John Does 1 Through 7 v. The Taliban et al., No. 20 Misc. 740 (GBD)(SN);
In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD)(SN)*

Dear Judges Daniels and Netburn:

On behalf of the Doe Judgment Creditors (“Doe Creditors”), we write to express our opposition to the letter filed by counsel for the Ashton Plaintiffs on May 5, 2022 in Case No. 03-md-01570-GBD-SN, DE 7962. Tellingly, that letter was filed in an action in which the Doe Creditors are docketing for purposes of the Court’s convenience, but in which the Doe Creditors are not parties. Yet, it essentially seeks a stay of the Doe Creditors’ execution proceedings pending in Case No. 20-mc-0740-GBD-SN, an action in which the Ashton Plaintiffs are not parties. This is improper. Just as the Ashton Plaintiffs are not parties in Doe Creditors’ case, Doe Creditors are not parties to either the MDL or the Framework Agreement. Doe Creditors note that the Ashton Plaintiffs do not posit that they would allow Doe Creditors to intervene in their action if the shoe were on the other foot, that is if Does had secured neither a judgment nor a writ, and we trust that the Court would not allow it either.

Finally, Doe Creditors agree with the Havlish Creditors that the filing appears to be nothing more than an unpermitted sur-reply.

Respectfully submitted,

/s/ Orlando do Campo
Orlando do Campo
DO CAMPO & THORNTON, P.A.
150 S.E. 2nd Avenue, Ste. 602

Miami, FL 33131
Phone 305 358 6600
Email od@dandtlaw.com

/s/ John Thornton

John Thornton (*pro hac vice*)
DO CAMPO & THORNTON, P.A.
150 S.E. 2nd Avenue, Ste. 602
Miami, FL 33131
Phone 305 358 6600
Email jt@dandtlaw.com

Daniela Jaramillo (*pro hac vice*)
DO CAMPO & THORNTON, P.A.
150 S.E. 2nd Avenue, Ste. 602
Miami, FL 33131
Phone 305 358 6600
Email dj@dandtlaw.com
Counsel for the Doe Creditors